

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,  
Defendants.**

**DECLARATION OF DONNA  
PRICE IN SUPPORT OF  
MOTION FOR PRELIMINARY  
INJUNCTION**

**Civil Action No. 1:17-CV-2989-AT**

DONNA PRICE, declares, under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. My name is Donna Price. I am an elector of the State of Georgia and a resident of DeKalb County. I have personal knowledge of the facts in this declaration and, if called to testify as a witness, I would testify under oath to these facts.
2. I am currently registered to vote in DeKalb County, Georgia.
3. I first cast a ballot in a Georgia election in 1992. I believe that I have voted in every presidential election since 1992 and in every midterm election at least since 2002. I have voted both on the Georgia GEMS Diebold/Premiere/ES&S paperless electronic voting system and on paper absentee ballots. I plan to vote on

an absentee paper ballot in future elections (including local elections this year, which are scheduled to occur on September 17, 2019, and next year) so that I will know there is a verified, software-independent record of my vote.

4. I am the director of Georgians for Verified Voting (GAVV), a nonpartisan organization that I founded in 2003 following concerns about the security of Georgia's electronic voting system. My concerns were spurred in part by the revelation that data from Georgia's Diebold AccuVote TS DRE voting system was found on the open Internet by elections integrity activist, Bev Harris. Unencrypted source code from the repository was inspected by national IT experts. I read early reports detailing vulnerabilities in the voting system that were based on those findings, including Aviel Rubin's "Analysis of an Electronic Voting System," published February 27, 2004.

5. In my capacity as director of GAVV, I work to educate the public and promote verifiable, secure, and transparent elections for Georgian voters.

6. I have served as a national leader representing Georgia in the elections integrity effort, including past membership on the advisory board of the VoteTrust USA National Leadership Group and currently as a member of the Elections Verification Network, a network of leaders, experts, and policy makers who "collaborate across disciplines and opinions toward two inseparable goals: voting is

accessible, private, reliable and secure; and elections are transparent, accurate and verifiable.”<sup>1</sup>

7. I have assisted in drafting and lobbying for legislation aimed at ensuring voter verification exists at the state and federal levels, working collaboratively with legislators from the Republican and Democratic Parties and representatives of the Green, Independent, and Constitutional parties.

8. In 2006, my partner in GAVV, Donna Curling, and I submitted a complaint to the State Election Board, which was forwarded to the attorney general, that argued that the state’s voting system, then administered by Secretary of State Cathy Cox, had not been certified in compliance with Georgia election law for elections conducted since 2002.

9. In my work on this issue, I have gained considerable knowledge about Georgia’s voting system and processes and how those compare to the voting systems of other states and recommendations of top national experts.

10. I have learned of the extreme vulnerability of Georgia’s system to undetectable errors and malicious tampering, and the failure of the system to provide a voter-verified mechanism, independent of software, for auditing the electronic results.

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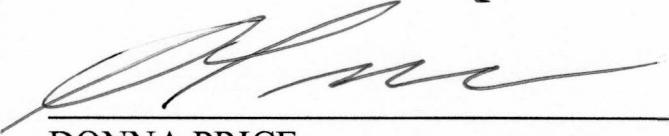
<sup>1</sup> <https://electionverification.org/who-we-are/>

11. I became even more concerned about the security of Georgia's elections in light of the public disclosure that an election server administered by the state's contractor, Center for Election Systems at Kennesaw State University, left critical election data open on the Internet without a firewall in at least 2016 and 2017, accessible to anyone with Internet access.

12. Georgia voters, including myself, are expected to trust that our votes are secure and counted in the face of numerous threats and vulnerabilities in our system, and absent any software-independent, voter-verified record to audit.

13. If Georgia conducts future elections on the current DRE system, I will be forced to vote on a system that I do not believe will count my vote equally and fully, or to jump through additional bureaucratic hoops to vote absentee, including requesting an absentee ballot by mail.

I declare under penalty of the perjury laws of the State of Georgia and the United States that the foregoing is true and correct and that this declaration was executed this 28th day of May, 2019 in Atlanta, Georgia.



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DONNA PRICE